

# EXHIBIT 40

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**From:** Porter, Katherine <kporter@akingump.com>  
**Sent:** Friday, January 17, 2020 4:05 PM  
**To:** Oluwole, Chautney M.; Benedict, Kathryn S.  
**Cc:** apreis@akingump.com; Hurley, Mitchell; PURDUE AKIN LIT; Atkinson, Michael (External); McClammy, James I.  
**Subject:** RE: Purdue request

Dear Chautney,

Am I correct in understanding that this chart only includes litigations if they are currently "pending"? Would you be able to send me a list of all opioid-related actions in which any of the Debtors or any of their related affiliates, or the Sacklers, are or were named as a defendant that are not still "pending"? Could you also send a list of settlements entered into by the Debtors related to opiate use, abuse, or marketing, and the settlement amount?

May we also request, with regard to the personal injury claims, any depositions, expert reports, and interrogatory responses in those cases? Would it be possible to arrange a phone conversation with a coordinating/national personal injury defense counsel?

Thank you again,

**Katherine Porter**

Direct: [+1 212.872.7467](tel:+1212.872.7467) | Internal: [37467](#)

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**From:** McMillian, Chautney R. <chautney.mcmillian@davispolk.com>  
**Sent:** Thursday, January 16, 2020 6:29 PM  
**To:** Porter, Katherine <kporter@akingump.com>; Benedict, Kathryn S. <kathryn.benedict@davispolk.com>  
**Cc:** Preis, Arik <apreis@akingump.com>; Hurley, Mitchell <mhurley@AkinGump.com>; PURDUE AKIN LIT <PURDUEAKINLIT@akingump.com>; Atkinson, Michael (External) <matkinson@provincefirm.com>; McClammy, James I. <james.mcclammy@davispolk.com>  
**Subject:** RE: Purdue request

We will look into gathering the international complaints, as well, Katherine.

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**From:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>  
**Sent:** Thursday, January 16, 2020 3:14 PM  
**To:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>  
**Cc:** [apreis@akingump.com](mailto:apreis@akingump.com); Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Subject:** RE: Purdue request

Thank you, Chautney. May I also request the international complaints? Thanks again!

**Katherine Porter**

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**From:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>  
**Sent:** Thursday, January 16, 2020 11:08 AM  
**To:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>  
**Cc:** Preis, Arik <[apreis@akingump.com](mailto:apreis@akingump.com)>; Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Subject:** RE: Purdue request

No problem, Katherine. We will gather the NAS complaints, and let you know when they have been uploaded to the data room.

**From:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>  
**Sent:** Thursday, January 16, 2020 11:00 AM  
**To:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>  
**Cc:** [apreis@akingump.com](mailto:apreis@akingump.com); Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Subject:** RE: Purdue request

Dear Chautney,

Thank you very much! We would like the complaints for the NAS claims.

Thank you

Katherine Porter

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**From:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>  
**Sent:** Thursday, January 16, 2020 8:06 AM  
**To:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>  
**Cc:** Preis, Arik <[apreis@akingump.com](mailto:apreis@akingump.com)>; Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Subject:** RE: Purdue request

Hi Katherine,

Thanks again for your patience. Just wanted to let you know that we have uploaded to the data room at folder 1.4.4, the following materials:

- A chart reflecting the pending personal injury claims, including the NAS claims, which are highlighted in yellow;
- Corresponding complaints for the pending personal injury claims (excluding the complaints for the NAS claims); and
- A chart reflecting all pending claims against the company.

With respect to the NAS claims, we have not provided copies of the complaints at this time because of the large volume and because we were unsure of whether you all intended to include these claims within the scope of your request. However, we are happy to provide these complaints upon request.

Please let us know if you all have any questions, or need additional information.

Thanks,

Chautney

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**From:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>  
**Sent:** Tuesday, January 14, 2020 1:06 PM  
**To:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>  
**Cc:** [apreis@akingump.com](mailto:apreis@akingump.com); Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Subject:** RE: Purdue request

That's great, thank you!

Katherine Porter

Direct: [+1 212.872.7467](tel:+1212.872.7467) | Internal: [37467](tel:37467)

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**From:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>  
**Sent:** Tuesday, January 14, 2020 1:05 PM  
**To:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>  
**Cc:** Preis, Arik <[apreis@akingump.com](mailto:apreis@akingump.com)>; Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Subject:** RE: Purdue request

Hi Katherine,

Thanks for checking in. We appreciate your patience.

We are in the process of gathering these materials, and we hope to get everything uploaded to the data room for your review in the next couple of days. We will let you know as soon as the documents are uploaded.

Thanks,

Chautney

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**From:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>  
**Sent:** Tuesday, January 14, 2020 1:02 PM  
**To:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>  
**Cc:** [apreis@akingump.com](mailto:apreis@akingump.com); Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Subject:** RE: Purdue request

Hi Chautney,

Just following up on the request for the list of PI claims and the complaints / petitions.

Thanks again for your help!

Katherine Porter

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**From:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>

**Sent:** Wednesday, January 8, 2020 4:59 PM

**To:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>

**Cc:** Preis, Arik <[apreis@akingump.com](mailto:apreis@akingump.com)>; Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>

**Subject:** RE: Purdue request

Thanks so much, Chautney! We appreciate you prioritizing this request.

Katherine Porter

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**From:** McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>

**Sent:** Wednesday, January 8, 2020 3:35 PM

**To:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>; Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>

**Cc:** Preis, Arik <[apreis@akingump.com](mailto:apreis@akingump.com)>; Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>

**Subject:** RE: Purdue request

**\*\*EXTERNAL Email\*\***

Hi Katherine,

Hope you are well. We are looking into this request, but we cannot guarantee a response this week. We will revert as soon as possible.

Thanks,

Chautney

**Chautney R. McMillian**

**Davis Polk & Wardwell LLP**

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**From:** Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>

**Sent:** Wednesday, January 8, 2020 11:01 AM

**To:** Benedict, Kathryn S. <[kathryn.benedict@davispolk.com](mailto:kathryn.benedict@davispolk.com)>; McMillian, Chautney R. <[chautney.mcmillian@davispolk.com](mailto:chautney.mcmillian@davispolk.com)>  
**Cc:** [apreis@akingump.com](mailto:apreis@akingump.com); Hurley, Mitchell <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; PURDUE AKIN LIT <[PURDUEAKINLIT@akingump.com](mailto:PURDUEAKINLIT@akingump.com)>; Atkinson, Michael (External) <[matkinson@provincefirm.com](mailto:matkinson@provincefirm.com)>  
**Subject:** Purdue request

Dear Kathryn and Chautney,

From our list of diligence requests, would you be able to prioritize sending us a list of the personal injury claimants (and the actual complaints/petitions of pending personal injury lawsuits)? We'd be very grateful if we could receive those this week.

Many thanks,  
Katherine

**Katherine Porter**  
**AKIN GUMP STRAUSS HAUER & FELD LLP**

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